



Montana Fish, Wildlife & Parks

Region Four Headquarters
4600 Giant Springs Road
Great Falls, MT 59405
March 7, 2007

Decision Notice Proposed Irrigation System and Historic Footbridge Improvements At Giant Springs State Park.

Description of Proposed Action:

This project would rehabilitate and improve the underground irrigation system that services the turf, trees, shrubs and vegetation at Giant Springs State Park. The irrigation system currently serving the park is antiquated and in very poor condition. The project would include replacement of main and lateral irrigation lines and installation of new and improved sprinkler heads. A new concrete masonry pump house would be constructed along with electrical control systems for the irrigation and pump system. The current pump house has serious safety deficiencies and the electrical controls are antiquated. Certain areas of the park with shallow and/or poor soil quality would receive additional topsoil to ensure the survival and viability of the park's turf and vegetative cover.

In addition to the irrigation system improvements, the project may also include repair or rehabilitate the existing historic poured concrete arched bridges that span the main discharge of the springs from its western edge to the Roe River Island.

Decision:

A draft Environmental Assessment regarding this proposed action was posted in the Public Notices section of the FWP website and advertised in the Legal Notices section of the Great Falls Tribune, and Helena Independent Record. Hard copies were also provided to the U.S. Forest Service (Lewis & Clark Interpretive Center), Cascade County Commissioners, Cascade County Planning Office, and City of Great Falls Historic Preservation Officer.

Based on the analysis in the EA, public comments, and consultation with the State Historic Preservation Office, I have decided to proceed with Alternative A in the draft Environmental Assessment to improve the underground irrigation system at Giant Springs State Park. Repair or rehabilitation of the historic arched concrete bridges may also be initiated, but only if the actions are compatible with the consultant's findings and concurrence of the SHPO.

This action is subject to appeal, which must be submitted to the FWP Director in writing, and postmarked within 30 days of the date of this decision notice. The appeal must specifically describe the basis for the appeal, explain how appellant has previously commented to the Department or participated in the decision-making process, and lay out how FWP might address the concerns in the appeal.

Public Comments:

Three public comments were received and are summarized below:

"This project will not have an affect on the floodplain."

John Nerud

Cascade County Planning Director

"Thank you for the opportunity to review and comment on the proposed Giant Springs State Park Irrigation System Improvements project and South Shore Conservation Easement. Based on information contained in the environmental assessments prepared by your agency, we do not have any concerns or comments regarding either of these projects."

Benjamin M. Rangel

Planning Director

City of Great Falls, MT

"I am disappointed with the draft environmental assessment (EA) cited above in its lack of significant identification, evaluation, and treatment plans for the cultural resources in Giant Springs State Park."

"In 1997 the Montana State Historic Preservation Office (MtSHPO) and the Department of Fish, Wildlife, and Parks (FWP) concurred that Giant Springs State Park (26CA620) was eligible for the National Register of Historic Preservation under at least two criteria (association with significant historic persons, and embodiment of Great Falls historic cultural values). The U. S. Fish and Wildlife Service (USFWS) commented that the park was probably also eligible as a traditional cultural property associated with Native Americans, but apparently the FWP did not address that issue further. The most recent description and evaluation of cultural resources in Giant Springs State Park was written in 2003 by Mitzi Rossillon and Ken Dickerson (Montana Smelter Reclamation Cascade County, Montana: A Cultural Resource Inventory and Evaluation. Renewable Technologies, Inc., Butte, prepared for the Montana Department of Environmental Quality, Mine Waste Cleanup Bureau, Helena) and that needs to be cited in the EA. In 2003 Dickerson also amended the Giant Springs State Park site form on file in the MtSHPO, citing among other things William Clark's 1805 description of the Springs. Dickerson noted that the integrity of some of the park's historic features had been diminished, but it had not been lost."

"The park's National Register status must be addressed in the EA, and any proposed rehabilitation efforts must be evaluated in the context of the whole resource. The proposal (p. 4) to rehabilitate the historic concrete bridges across the Giant Springs

outflow area and “other features” has no specific descriptions of these structures, their historic values, and/or the proposed rehabilitation effort, and yet (p. 18) the conclusion has been reached that there will be no destruction or alteration of any site, structure, or object of historic importance. Page 18 also states that there would be no impacts from the proposed rehabilitation efforts on the park’s unique cultural values. This is not compliant with either of the National or Montana Environmental Policy Acts.”

“As an experienced professional cultural resource manager (Knudson, 1993. The Upper Missouri National Wild and Scenic River Cultural Resource Management Plan. U.S. Department of the Interior, Bureau of Land Management, Montana State Office, Billings), I believe that the park is also eligible for the Register as a cultural landscape or traditional cultural district—comparable to the USFWS 1997 conclusion. There is no documentation of consultation with Native Americans that led to the conclusion (p. 18) that there will be no effects on existing religious or sacred uses of the site or area. Has the park ever consulted with Native Americans about their traditions related to this spring system that has apparently been flowing for thousands of years? What about the use of the Springs area for weddings and other sometimes religious activities?”

“Ultimately a comprehensive cultural resource management plan needs to be completed for Giant Springs State Park. As part of that plan, FWP needs to consult with all the tribes that were party to the 1855 Blackfeet or Lemhi Treaty (e.g., Blackfeet, Blood, Cree, Flathead, Gros Ventre, Nez Perce, Piegan). That doesn’t need to be completed before completion of the current EA—but it must be addressed within the latter document, with a proposed schedule for the completion of consultation, evaluation, and planning.”

“Thomas Patton of the Montana Bureau of Mines and Geology gave a presentation at the 2006 Montana Water Conference (Climate impact on Giant Springs: a first magnitude spring in Montana) that is an excellent discussion of the Giant Springs hydrogeology—I recommend that you include comments from that presentation within your discussion of the proposed changes at the Springs and consult with him (tpatton@mtech.edu) about impacts of the proposed changes.”

“The ultimate conclusion of an evaluation of the range of prehistoric, historic, and traditional cultural resource values at Giant Springs may indeed be that rehabilitation of the bridge and other structures has no significant impact on those resources—but that evaluation must be made and publicly documented!”

Ruthann Knudson, Ph.D.
Great Falls, MT

Response to Comments:

In Feb. 2007, FWP contracted the services of Ken Seivert of Sievert & Sievert Cultural Resource Consultants, Great Falls, MT to assess the conditions of the park’s historic masonry and rock features that have been determined to be eligible for listing on the National Register. The consultant will prepare a report, due no later than Jun. 30, 2007, to guide any future work on these features. FWP would apply U.S. Department of Interior standards for any repair or rehabilitation of any eligible features and the State

Historical Office will be consulted prior to the initiation of any work and throughout the process. This on-going assessment will be referenced in the final Environmental Assessment.

On Feb. 1, 2007, a letter was sent to the Cultural Resource/Historic Preservation Officer of the Chippewa Cree Tribe, Gros Ventre and Assiniboine Tribes, Confederated Salish & Kootenai Tribe, Little Shell Tribe of Chippewa Indians, and the Blackfeet Nation, soliciting their comments on this proposed project. No written responses were received. FWP followed up with personal phone calls to the tribes during the week of Feb. 12 and no opposition to this project was voiced. John Murray, Blackfeet Tribal Historical Officer did respond that the Giant Springs and areas around Great Falls are in traditional Blackfeet Country. FWP remains open to any future feedback from the tribes regarding our management activities at Giant Springs State Park.

FWP concurs with Montana SHPO and Dr. Knudson's assessment that the Giant Springs area is eligible in the National Register as a Traditional Cultural Property. SHPO has advised that this eligibility is based on the park's on-going cultural association with the City of Great Falls, social and recreational patterns of local citizens, popularity as a picnicking and gathering place and. FWP suggests that rehabilitation of the park's irrigation system would enhance, rather than degrade those eligibility factors.

On Feb. 2 FWP consulted with Thomas Patton, Hydrogeologist with Montana Bureau of Mines and Geology in regard to the proposed projects on replacing the irrigation system at Giant Springs and possibly rehabilitation of the historic masonry bridges at the spring.

Mr. Patton is very familiar with Giant Springs and felt there would be no impact on the springs with the work proposed. He stated that since the bridges are outside of the main pool, and work is to be completed primarily above the water line there would be no impact. He further said that the geology of the springs is such that structures could be built within the springs themselves and still not have an impact. He also said that the irrigation system work would have no impact. Mr. Patton acknowledged indications that climatic change has decreased the flow from the aquifer, but advised that his issue has no apparent connection with the proposed work.

On Jan. 26, 2007, FWP conducted a consultation with SHPO regarding the comments received from Dr. Knudson and the project in general. SHPO advised that FWP's actions as outlined above would ensure that our cultural resource compliance responsibilities are fulfilled and concurred that the rehabilitation of the irrigation system was a necessary and appropriate action that would not adversely affect cultural resources.

FWP's consultation with SHPO will be referenced in appropriate sections of the Environmental Assessment that analyzes the impacts to the human and natural environment from the proposed actions.

FWP believes that implementing Alternative A in context with the aforementioned actions will not have an adverse impact in the cultural or historical integrity or National Register eligibility of the Giant Springs area.

The Final Environmental Assessment may be viewed, or obtained from Montana Fish, Wildlife & Parks, Region Four Headquarters, Great Falls, MT. If you have questions regarding this decision notice, or the final EA, please direct requests and questions to: Mr. Gary Bertellotti, Region Four Supervisor, 4600 Giant Springs Road, Great Falls, MT 59405, (406) 454-5846.

 /s/

Gary Bertellotti
Region 4 Supervisor